

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
CHARLENE TALARICO,

Plaintiff,

-against-

PORT AUTHORITY OF NEW YORK AND NEW
JERSEY,

Defendant.
-----X

AFFIDAVIT

18-cv-0909
(JPO)

STATE OF NEW JERSEY)

) SS:

COUNTY OF HUDSON)

Randy Greenstein, being duly sworn, deposes and says:

1. I am employed as the Supervisory Police Investigator for the Office of Inspector General (“OIG”) within the Port Authority of New York and New Jersey.

2. As part of my duties and responsibilities, I am familiar with internal practices for conducting investigations within OIG.

3. This affidavit is made in reference to the case *Charlene Talarico v. Port Authority of New York and New Jersey*, Docket No.: 18-CV-0909 (JPO).

4. Prior to signing this affidavit, at the request of the attorneys for the Port Authority, I reviewed internal records concerning the investigation conducted by OIG in relation to Charlene Talarico’s Harassment complaint #S-2016-000352 against Dianne Ehler filed in Weehawken Township Municipal Court.

5. Based upon my review of the records, it is my understanding that as a result of Ms. Talarico’s complaint with the OIG and the discussions with the Port Authority Law Department, and Port Authority Human Resources Department an investigation was commenced by former

OIG Detective Mark Gaunt, in relation to the underlying criminal matter in Weehawken, New Jersey captioned, *State v. Dianne Ehler*, Docket No. S-2016-000352.

6. Based on my review of internal records, as is common practice during an internal OIG investigation, Detective Gaunt interviewed witnesses, gathered information, documents and physical evidence, including the video at issue in the underling matter.

7. According to internal records, Detective Gaunt contacted former Security Technologies Administrator Joseph Boyle of the Real Estate Services Department via email.

8. Within said email Detective Gaunt requested all videos from the 8th floor of OMS on August 4, 2016 between the hours of 12 p.m. and 3 p.m.

9. According to internal records Mr. Boyle downloaded all videos within the parameters provided and transferred the same onto a DVD. The DVD was then provided to Detective Gaunt who later provided the aforesaid DVD to the Weehawken Municipal Prosecutor.

10. To the best of my knowledge this investigation is the only instance where footage from the video camera at issue was retrieved and reviewed.

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

5/24/21

Date

DocuSigned by:

Randy Greenstein

89385214A07C4BA

Signature

On the 24th day of May, 2021 before me, the undersigned, personally appeared **Randy Greenstein**, personally known to me or proved to me on the basis of satisfactory evidence to be the individual whose name is subscribed to the within instrument and acknowledge to me that he executed the same in his capacity and that by his signature on the instrument, the individual or the person on behalf of which the individual acted, executed the instrument.

DocuSigned by:

Katrina Smart

87FD19385C6747D...

Notary Public

Notary ID:

Expiration:

KATRINA SMART
Notary Public
State of New Jersey
Commission Expires 9/11/2023